

September 22, 1999

The Honorable Carolyn L. Huntoon
Assistant Secretary for Environmental Management
Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0113

Dear Dr. Huntoon:

I would like to thank you for your participation in the September 9, 1999, Defense Nuclear Facilities Safety Board (Board) public meeting to discuss the Department of Energy's (DOE) progress toward implementing Recommendation 94-1, *Improved Schedule for Remediation*.

Based on your comments during the meeting, the Board is confident that you will take the necessary actions to resolve issues hindering implementation of this important recommendation. In order to provide closure on certain issues, the Board requests that you provide a statement detailing specific plans and commitments to resolve several key issues (listed below) discussed in the public meeting. The Board believes this information is needed to fully understand the health and safety implications of these issues and to support evaluation of potential Board actions regarding Recommendation 94-1. The Board will keep the public meeting record open until October 9, 1999, to incorporate your reply.

- **Recovery of Schedule:** Further delays have arisen only eight months after DOE issued its latest implementation plan. They include polycube stabilization and cementation of residues at Hanford; all activities at Savannah River Site (SRS) that relied on the Actinide Packaging and Storage Facility (APSF); stabilization of plutonium and neptunium solutions stored in the SRS H-Canyon; stabilization of Mark-16/22 spent nuclear fuel at SRS; stabilization of highly-enriched uranium solutions stored in tanks outside of H-Canyon; and stabilization of the americium and curium solutions stored in the SRS F-Canyon. The Board requests that a plan be provided specifying how lost time in stabilizing these materials will be recovered.
- **Implementation Plan Completion:** DOE's December 1998 Implementation Plan for Recommendation 94-1 did not provide definite plans or schedules for material stabilization activities affected by suspension of the APSF at SRS. In the public meeting, DOE representatives stated that DOE did not schedule completion of this plan until July 2000. The Board requests that the efforts to complete the plan be accelerated to the extent possible, and that a significantly improved commitment date for completing the plan be provided.

- **Plutonium Stabilization, Packaging, and Storage:** DOE's decision to suspend APSF disrupted well-founded plans for stabilizing, packaging, and safely storing plutonium metal and oxides presently at SRS and Hanford. Hanford is developing new plans to meet the implementation plan commitments, but SRS now expects at least a 3-year delay in stabilizing and packaging its plutonium. The Board requests that DOE provide (again, much sooner than July 2000) a date by which DOE will decide how, where, and when plutonium at SRS will be stabilized and packaged to meet the long-term plutonium storage standard. The recent contamination incident at an SRS FB-Line storage vault illustrates the need to complete this effort as soon as possible.

Furthermore, in the absence of APSF or another new storage facility, existing facilities such as the 235-F Building and K-Area at SRS are planned to be used to store plutonium from SRS, Rocky Flats, Los Alamos, and Hanford. These existing facilities were not originally designed for such storage; in particular, K-Area would require that the plutonium packages be stored inside shipping containers, and would provide no capability to perform adequate surveillance of the stored materials. The consequences of a contamination release similar to the recent FB-Line event could be even greater in such a facility. The Board requests that DOE provide a commitment date by which DOE will have developed an integrated Stabli plan for stabilized plutonium packages.

- **Changes to Commitments:** Activities committed to in the implementation plan are being delayed and/or redirected without appropriate technical review of the safety implications or proper notification of the Board by the Secretary of Energy. Many of these changes are driven by short-sighted budget decisions. The Board requests a statement regarding how this problem is being corrected.

If you have comments or questions on this matter, please do not hesitate to contact me.

Sincerely,

John T. Conway
Chairman

c: Mr. Mark B. Whitaker, Jr.